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13 *Brendan Wesolowski*

14 UNITED STATES DISTRICT COURT  
15 DISTRICT OF NEVADA  
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18 DEBORAH KIM, an individual,  
19 Plaintiff,  
20 v.  
21 BRENDAN WESOLOWSKI, an individual;  
EMERSON AUTOMATION SOLUTIONS, a  
22 corporation; and DOES 1-10, inclusive,  
23 Defendants.  
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CASE NO.: 2:24-cv-00785-JAD-MDC

**STIPULATION TO EXTEND DISCOVERY  
DEADLINES PURSUANT TO LR 26-3 AND  
[PROPOSED] ORDER**

1 Plaintiff, DEBORAH KIM and Defendants BRENDAN WESOLOWSKI and EMERSON  
 2 PROCESS MANAGEMENT POWER & WATER SOLUTIONS, INC., by and through their  
 3 respective counsel, pursuant to District of Nevada LR 26-3, hereby submit this stipulation to a  
 4 continuance of discovery deadlines as follows:

5 **A. STATEMENT SPECIFYING COMPLETED DISCOVERY:**

- 6 1. The parties have exchanged their FRCP 26 initial disclosures, as well as multiple
- 7 supplements thereto;
- 8 2. The parties have produced documents and exchanged written discovery; and
- 9 3. The parties deposed a witness to the incident;
- 10 4. Plaintiff Deborah Kim has been deposed;
- 11 5. Deposition of defendant Brendan Wesolowski.

12 **B. STATEMENT OF DISCOVERY THAT REMAINS TO BE COMPLETED:**

- 13 1. Depositions of plaintiff's experts; and
- 14 2. Depositions of defendant's experts.

15 **C. REASONS THAT DISCOVERY WILL NOT BE COMPLETED IN THE TIME**  
 16 **LIMITS:**

17 On or around February 3, 2025, the parties exchanged Initial Expert Witness Disclosures.  
 18 The expert witnesses disclosed by Plaintiff and Defendants include seven retained medical type  
 19 experts, six of whom are doctors with busy schedules and limited availability for depositions. On  
 20 March 4, 2025, Defendant identified expert availability for three of its five retained experts. At the  
 21 time of filing this Stipulation and [Proposed] Order, the parties are diligently reaching out to their  
 22 remaining respective experts for deposition dates. While the parties have agreed on scheduling  
 23 deposition dates for the experts, several of those experts are only available past the expert discovery  
 24 deadline cutoff.

25 **D. STATEMENT OF GOOD CAUSE:**

26 The soonest deposition scheduled in this matter is a deposition of Plaintiff's healthcare  
 27 financial expert, Lawrence Lievense, scheduled for March 21, 2025. Plaintiff has provided  
 28 availabilities for its other experts for various dates in April, 2025. However, all of the provided

1 dates on which Plaintiffs' other experts are available are after the close of expert discovery,  
 2 currently scheduled for April 2, 2025. The parties are diligently communicating and finalizing the  
 3 schedules for expert depositions, but will not be able to depose all experts by the close of expert  
 4 discovery. Therefore, the parties agree to a 45-day extension of all remaining deadlines. There is  
 5 good cause for this extension because 1) the parties are diligently communicating to schedule  
 6 depositions of all retained experts, and 2) the parties would be prejudiced if the retained experts  
 7 identified by each party cannot be deposed. The parties stipulated to the requested extension and  
 8 proposed the stipulation to the Court as soon as practicable.

9 **E. CURRENT SCHEDULE FOR COMPLETING DISCOVERY:**

10	Close of Expert Discovery:	April 2, 2025
11	Dispositive Motion Deadline:	May 5, 2025
12	Joint Pre-Trial Order:	June 3, 2025

13 **F. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY:**

14	Close of Expert Discovery:	May 19, 2025
15	Dispositive Motion Deadline:	June 20, 2025
16	Joint Pre-Trial Order:	July 18, 2025

17 **G. CURRENT TRIAL DATE:**

18 There is no trial date set for this matter.

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1 WHEREFORE, the parties respectfully request this Honorable Court adopt the parties'  
2 foregoing discovery stipulation.

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4 Respectfully submitted,

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6 Dated this 12<sup>th</sup> day of March, 2025

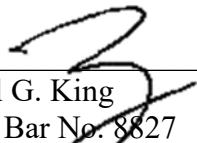
7 LAGSTEIN LAW FIRM, P.C.

8  
9 /s/ Eran Lagstein

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14 *Attorney for plaintiff Deborah Kim*

Dated this 12<sup>th</sup> day of March, 2025

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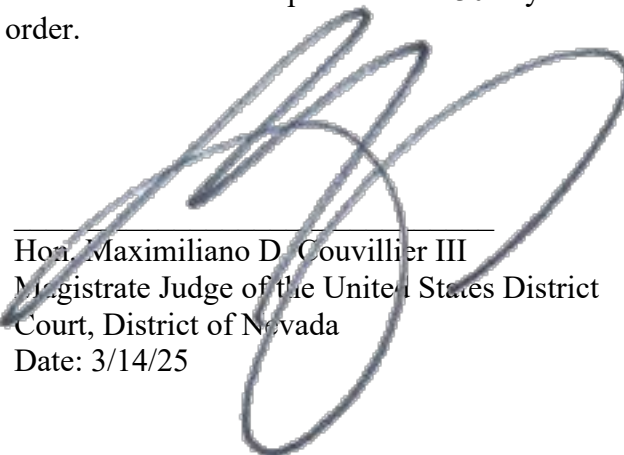
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**ORDER**

On review of the foregoing stipulation of the parties and finding good cause therefore, **IT IS SO ORDERED** that the deadlines are extended, as requested and written herein. If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

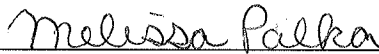


Hon. Maximiliano D. Couvillier III  
Magistrate Judge of the United States District  
Court, District of Nevada  
Date: 3/14/25

**CERTIFICATE OF SERVICE**

I certify that on this 12<sup>th</sup> day of March, 2025, the foregoing **STIPULATION TO EXTEND DISCOVERY DEADLINES PURSUANT TO LR 26-3 AND [PROPOSED] ORDER** was served on the parties via electronic service through the United States District Court for the District of Nevada's ECF system per the agreement of counsel addressed as follows:

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Melissa Palka